

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NORTH CAROLINA
GREENVILLE DIVISION**

**IN RE: COLLINS WARREN
DIANA R. WARREN
DEBTOR(S)**

**CASE NO. 13-03517-8-RDD
CHAPTER 13**

MOTION TO MODIFY CHAPTER 13 PLAN

Debtor(s), Collins and Dianna Warren, by and through the undersigned attorney, hereby move the Court for modification of the Chapter 13 Plan. In support of Debtors' motion, Debtors show the Court the following:

1. Debtors filed this Chapter 13 case on June 3, 2013 and the plan was confirmed with payments set at \$350.00 per month for a period of 57 months.
2. Subsequent to confirmation, the Chapter 13 Trustee filed a Notice of Requirement To Modify Chapter 13 Plan for a modified plan with payments set at \$1,850.00 per month for a period of 1 month, \$1,864.00 per month for a period of 7 months and \$1,930.00 per month for a period of 49 months beginning March 2014.
3. Debtors agree with the required modification.

Wherefore, Debtor respectfully prays the Court as follows:

1. That the Court approve Debtors' Motion to Modify Chapter 13 Plan.
2. That Debtors' plan be modified for a plan with payments set at \$1,850.00 per month for a period of 1 month, \$1,864.00 per month for a period of 7 months and \$1,930.00 per month for a period of 49 months beginning March 2014.
3. That the Court order such other and further relief as to the Court may seem just and proper.

DATE: 02/17/14

CRAFT, LEVIN & ABNEY, L.L.P.

BY: s/Peggy S. Levin
Peggy S. Levin
Attorney for Debtor(s)
1701 Sunset Avenue, Suite 207
Rocky Mount, NC 27804
(252) 972-2279

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NOTICE OF MOTION

Debtors, Collins and Diana Warren, have filed papers with the court to modify the Chapter 13 Plan.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. *(If you do not have an attorney, you may wish to consult one.)*

If you do not want the court to grant the motion, or if you want the court to consider your views on the motion, then on or **before March 13, 2014**, unless otherwise ordered, you or your attorney must file with the court, pursuant to Local Rule 9013-1 and 9014-1, a written response, an answer explaining your position, and a request for hearing at :

United States Bankruptcy Court
Clerk of Court
PO Box 791
Raleigh, NC 27602

If you mail your objection to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above.

You must also mail a copy to:

Richard M. Stearns
Chapter 13 Trustee
1015 Conference Drive
Greenville, NC 27858

Peggy S. Levin
Attorney for Debtor(s)
1701 Sunset Ave., Ste. 207
Rocky Mount, NC 27804

Collins and Diana Warren
1176 Jordan Mill Road
Seaboard, NC 27876

If a response and a request for hearing is filed in writing on or before the date set above, a hearing will be conducted on the motion at a date, time and place to be later set and all parties will be notified accordingly.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief.

Date: February 17, 2014

CRAFT, LEVIN & ABNEY, L.L.P.

BY: s/Peggy S. Levin
Peggy S. Levin
Attorney for Debtor(s)
1701 Sunset Avenue, Suite 207
Rocky Mount, NC 27804
(252) 972-2279

CERTIFICATE OF SERVICE

I, PEGGY S. LEVIN, 1701 Sunset Avenue, Suite 207, Rocky Mount, North Carolina 27804 do hereby certify:

That I am, and at all times hereinafter mentioned was, more than eighteen (18) years of age;

That on the 17th day of February, 2014, I served copies of the foregoing Motion to Modify on all parties on the attached mailing matrix by first class mail or electronic filing.

DATE: 02/17/14

CRAFT, LEVIN & ABNEY, L.L.P.

BY: s/Peggy S. Levin
Peggy S. Levin
Attorney for Debtor(s)
1701 Sunset Avenue, Suite 207
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(252) 972-2279

CITIMORTGAGE
PO BOX 688971
DES MOINES, IA 50368-8971

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STE 640
RALEIGH, NC 27601

ALBERT TAYLOR HAYNES
SHAPIRO & INGLE
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CHARLOTTE, NC 28216-2461

PATTI H. BASS
BASS & ASSOCIATES, PC
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1000 TECHNOLOGY DRIVE
O FALLON, MD 63368-2240

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PO BOX 1847
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INTERNAL REVENUE SERVICE
CENTRALIZED INSOLVENCY OP
PO BOX 7346
PHILADELPHIA, PA 19101-7346

QUANTUM3 GROUP LLC
AGENT FOR GALAXY
PORTFOLIOS, LLC
PO BOX 788
KIRKLAND, WA 98063-0788

REGIONAL ACCEPTANCE
PO BOX 830913
BIRMINGHAM, AL 35283-0913

SANTANDER FINANCIAL
PO BOX 560284
DALLAS, TX 75356-0284

RICHARD M. STEARNS
CHAPTER 13 TRUSTEE
1015 CONFERENCE DRIVE
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